

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MATTHEW P. BYRNE, Administrator
of the Estate of Eileen M. Byrne,

Plaintiff,

v.

VOLVO CARS OF NORTH AMERICA, LLC,
VOLVO CAR CORPORATION and FORD
MOTOR CORPORATION,

Defendants.

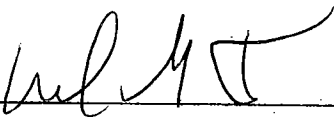
CIVIL ACTION NO. 05-10861-NMG

DEFENDANTS'
CERTIFICATION PURSUANT TO LOCAL RULE 16.1(D)(3)

Defendants Volvo Cars of North America, LLC ("VCNA"), Volvo Car Corporation ("VCC") and Ford Motor Corporation ("Ford")(collectively, "Defendants"), by their authorized representative, and undersigned counsel hereby certify that they have conferred: (a) with a view to establishing a budget for the costs of conducting the full course -- and various alternative courses -- of the litigation; and (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs.

VOLVO CARS OF NORTH AMERICA,
VOLVO CAR CORPORATION, and
FORD MOTOR CORPORATION,

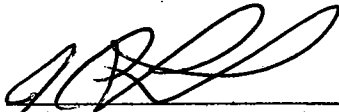
By its authorized representative:



Dated: 7/11/05

VOLVO CARS OF NORTH AMERICA, LLC,
VOLVO CAR CORPORATION, and FORD
MOTOR CORPORATION.

By their Attorneys,



Robert J. Muldoon, Jr. (BBO #359480)
John C. La Liberte (BBO #556046)
Anthony L. DeProspero, Jr. (BBO #644668)
Sherin and Lodgen LLP
101 Federal Street
Boston, MA 02110
(617) 646-2000

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy
of the above document was serviced upon the
attorney of record for each party by ~~mail~~ by hand *facsimile*

Date: 8/19/05 John C. La Liberte *cus*